

From: [Mueller, Brian](#)
To: [Owens, Robert](#)
Cc: [Casanova, Rafael](#)
Subject: Re: Falcon Refinery Project Plans (TO - 0088-RICO-06MC)
Date: Tuesday, January 29, 2013 8:10:47 AM

Robert

My responses to your questions are inserted in blue after each question below. Please call me if you have any questions.

thanks

Brian W. Mueller

R6 Remedial Project Manager

(214) 665-7167

From: "Owens, Robert" <rowens@eaest.com>

To: Brian Mueller/R6/USEPA/US@EPA

Date: 01/15/2013 10:50 AM

Subject: Falcon Refinery Project Plans (TO - 0088-RICO-06MC)

Brian:

As we discussed this morning, we are in the process of addressing the comments concerning the various project plans for the Falcon Refinery RI/FS task order. Additional locations and samples will be required to address the comments pertaining to ground water, soil and sediment sampling. We have questions pertaining to some of these comments. The discussions below provide our approach to address the comment or the questions we have pertaining to it. Your additional input/clarification is needed for us to provide the most feasible technical approach to address the comments. Attached are the figures for the areas covered by the comments from the Field Sampling Plan (FSP). I have sketched the locations of the highlighted PRP sample locations.

According to our RI/FS Work Plan (WP), the final project plans incorporating your comments are required within seven days of receiving the comments. We are pushing to submit the final plans by Friday (18 January 2013) but need your additional input to ensure that our responses are complete.

1. Ground Water Sampling Locations – (Two additional monitor wells and associated sampling will be



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required to address these comment.)

a. (TW01-01); Response – Proposed well MW-01 will be moved to the location of temporary well TW01-01.

b. (TW01-02); Response - The tables provided indicated that the benzene concentration in temporary well TW01-02 was 0.00065 mg/l. The EPA tap water screening level for benzene is 0.00039 mg/l. Add an additional monitoring well to this location.

c. (TW01-07); Response - Proposed well MW-02 is already located at the location of TW01-07. **Question – Does EPA want another well near this location?**

Yes

d. (TW01-11 and TW-012) Response - Proposed well MW-03 was placed between these two temporary well locations. **Question - Does EPA want us to move MW-02 to the location of TW01-11 and add another monitor well at the location of TW01-12?**

Yes

e. (TW01-18); Response – Proposed well MW-07 will be moved to this location.

2. Soil Sampling Locations

a. (J-03S, J-04S and J-09S); Response - VSP evaluation indicated that no additional soil samples were needed in AOC 1N. EA proposed to install two judgmental borings in the location of borings J-03S and J-04S to confirm contamination at those locations. EA can add a judgmental sample at the location of J-09S. **Question - Does EPA want additional borings/samples (6-8) to further delineate these isolated areas?**

Yes

b. (J-05S and J-10S); Response - VSP evaluation indicated that no additional soil samples were needed in AOC 1N. EA can add a judgmental samples at the locations of J-05S and J-10S. **Question - Does EPA want additional borings/samples (6-8) to further delineate these isolated areas?**

Yes

3. Redfish Bay Sediment Sampling Locations

a. (J-60SD); Response – EA can add a judgmental sample at the location of J-60SD. **Question – Does EPA want additional sediment samples (2-3) to further delineate this isolated area?**

Yes

The number of sample types and analyses in the FSP already differs from the estimated numbers in our Work Plan (WP). The WP numbers were estimated by EPA and EA prior to a full evaluation of the PRP generated data. As previously documented, the completeness of the PRP generated data was such that additional sample types and numbers are required to provide a defensible RI for the site. We will submit a field change form (FCF) following

the finalization of the project plans that documents the differences in sample types and numbers.

Please let me know if you have any questions.

Thank you,

Bob Owens

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[attachment "EPA Comment Figures.pdf" deleted by Brian Mueller/R6/USEPA/US]